REMARKS

Status of the Application

Claims 1-10 were previously pending. Claims 1-10 were rejected under 35 USC 102(e) as being anticipated by Jones et al. (US 6,438,638). Additionally, claims 1-10 were also rejected under 35 USC 102(e) as being anticipated by Shieh et al. (US 2002/0185533).

Applicant has amended claims 1, 5, and 9, canceled claims 4 and 8. No new matter adds through the amendments. For the reasons discussed below, withdrawal of the rejections is requested.

Claim Rejections

Claims 1-10 were rejected under 35 USC 102(e) as being anticipated by Jones et al. (US 6,438,638).

Applicant respectfully traverses the rejections for reasons discussed below.

The Office Action indicated that the USB connector (46) in US6438638 is equivalent to the connector recited in claim 1, the USB converter chip (40) is equivalent to the controller recited in claim 1, and CompactFlash card (16) is equivalent to the replaceable flash recited claim 1 and, thus, US Patent No. 6438638 teaches a portable USB data storage device without a built in flash memory storage and a connector interface (62) that can attach/detach a flash memory card (16).

However, firstly, US 6438638 and the present invention are directed to different type of devices. US6438638 relates to a reader of the flash memory for reading data from different flash memory, while the present application relates to an USB removable memory for improving conventional USB removable memory. Secondly, the amended claim 1 in the present application recites that "the replaceable flash memory as a physically-independent storage component is replaceably and directly attached to the body **by containing said replaceable flash memory within a chamber which is provided between the body and a dismountable back cover or by means of elastic fasteners set on said replaceable flash memory and said body respectively".** The purpose of this kind of connection is to make the flash memory replaceably,

yet firmly, connect to the body. The reason is that the connecting state between the flash memory and the body is the normal operation state which is in need of persisting for a long time as a memory. Because of this characteristic the memory is different from the card reader. A flash memory does not have to stably and firmly connect with a card reader for a long time, and it is only needed to connect with the card reader by the USB interface when data is read and written, so the card reader does not need to be set the relevant structure for stable connecting. Thirdly, the converter chip (40) is not equivalent to the controller recited in claim 1 of the present application, because the converter chip (40) must include the parts such as CPU to implement data transmission without the supporting of a PC. While the controller as recited in the amended claim 1 does not include any CPU.

For at least the reasons discussed above, applicants respectfully submit that US6438638 cannot anticipate the amended claim 1 of the present application. Claims 2-3, 5-7, and 9-10 depend on claim 1 and, thus, are not anticipated by US6438638 for at least the same reasons discussed above. In addition, these dependent claims contain features that further distinguish over US6438638. For example, the guide channel in claims 2 and 9, the plug-in connection in claim 3, the elastic clasp formed on the housing of the replaceable flash memory and the notch correspondingly formed on the housing of the body in claim 5 are not taught by US6438638.

Claims 1-10 were also rejected under 35 USC 102(e) as being anticipated by Shieh et al. (US 2002/0185533).

The Office Action indicated that USB2.0 connection port (50) in US2002/0185533 is equivalent to the connector recited in claim 1 of the present application, the controller (30) is equivalent to the controller recited in claim 1 of the present application, and flash memory card (40) is equivalent to the replaceable flash recited in claim 1 of the present application and, thus, US Publication No.2002/0185533 teaches a portable USB data storage device without a built in flash memory storage and a connector interface that can attach/detach a flash memory card.

However, firstly, US Publication No.2002/0185533 and the present invention are directed

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to different type of devices. US2002/0185533 relates to a reader of the flash memory for reading data from different flash memory and the present application relates to an USB removable memory for improving the conventional USB removable memory. Secondly, the amended claim 1 in the present application recites that "the replaceable flash memory as a physically-independent storage component is replaceably and directly attached to the body **by containing said replaceable flash memory within a chamber which is provided between the body and a dismountable back cover or by means of elastic fasteners set on said replaceable flash memory and said body respectively".** The purpose of this kind of connection is to make the flash memory replaceably, yet firmly, connect to the body. As discussed above, a card reader does not need or require such long term firm connection with the memory card to be read.

For at least the reasons discussed above, applicants respectfully submit that US2002/0185533 cannot anticipate the amended claim 1. Claims 2-3, 5-7, and 9-10 depend on claim 1 and, thus, are not anticipated by US2002/0185533 for at least the same reasons discussed above. In addition, these dependent claims contain features that further distinguish over US2002/0185533. For example, the guide channel in claims 2 and 9, the elastic clasp formed on the housing of the replaceable flash memory and the notch correspondingly formed on the housing of the body in claim 5 are not taught by US2002/0185533.

Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the remaining claims 1-3, 5-7, and 9-10 are now in condition for allowance. Allowance of this application is earnestly solicited.

Respectively submitted
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